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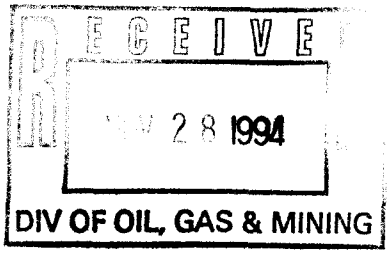
GENWAL COAL COMPANY

November 22, 1994



Mr. Darron R. Haddock
Permit Supervisor
State of Utah
Department of Natural Resources
Division of Oil, Gas, and Mining
3 Triad Center, Suite 350
Salt Lake City, Utah 84180-1203

Re: Response to November 7, 1994 letter regarding "Deficient SAE Plans, Genwal Coal Company, Crandall Canyon Mine, ACT/015/032-94E, Folder #2, Emery County, Utah."

file #2 Copy Darron

Dear Darron:

As we discussed earlier today in our telephone conversation, I am responding to your November 7, 1994 letter asking for additional information of SAE's 3,5,6, and 7. The fax transmission of this letter will serve as our official response. However, an original of the letter will be sent by regular mail.

I appreciate you pointing out potential discrepancies in our September 26, 1994, ASCA and SAE submittal. You are correct in pointing out that no dam exists within or contiguous to SAE 3. The verbiage which was previously in this portion of the text concerning dam life expectancy has been removed. A revised page 7-59 has been included with this letter.

Because of the prolific vegetative cover which is present on SAE's 5,6, and 7 (topsoil storage areas) Genwal is requesting that the requirement for sediment control be removed on these three areas. It is understood that additional information is required inorder for the Division to grant such an approval. Thus, Genwal respectfully requests that an extension be granted until January 13, 1995 for submission of the SEDIMONT II calculations for SAE's 5, 6, and 7. calculations

The extension will allow Genwal ample time to purchase SEDIMONT II and perform the desired sediment and erosion calculations. If you have any questions regarding this response, please call.

Sincerely,

Randolph B. Gainer, P.G.
Environmental Manager

cc: Jay Marshall

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Sedimentation control will, therefore be provided. The disturbed area associated with ASCA-8 is 0.17 acre.

Sedimentation control for ASCA-8 will be provided by a silt fence installed in accordance with Figure 7-12 between the parking area and Crandall Creek. The silt fence will be periodically inspected and repaired as required to ensure that its integrity is maintained.

Small Area Exemptions (S.A.E.)

Small Area Exemptions are requested for the following locations. These areas are also shown on Plate 7-5 and Plate 2-3.

SAE-3: consists of a small area (0.32 acre) on the south side of the U.S. Forest Service access road that has served in the past as the materials storage/office pad. The northern portion of this area was reclaimed using final reclamation techniques outlined in Section 3.5 (see Plate 7-5C). A berm of boulders was placed between SAE-3 and the road to prevent access to the reclaimed area. A straw-bale dike (Figure 7-11) was installed along the southern portion of the reclaimed area to serve as a sediment-control device prior to effective revegetation.

The southern portion of SAE-3 consists of boulders piled against the outslope of the pad. These boulders were blasted from the site high wall during initial construction. Due to potential stability problems that might be created by removal and the difficulty of removing these boulders from the outslope, this slope will remain unreclaimed.

The effectiveness of the reclamation activities was modeled using SEDIMOT II. Results of these calculations are contained in Appendix 7-9. According to this appendix, the peak effluent suspended sediment concentration from SAE-3 during the 10-year, 24-hour storm is 2 milligrams per liter. This concentration is within the standards established by the R645 rules.

SAE-5, SAE-6, and SAE-7 consist of the topsoil stockpiles that are located on the south side of the access road east of the mine site in the areas indicated in Figure 7-12. Sae-6 and SAE-7 also include small gravel stockpiles used for maintenance of the access road. Disturbed areas associated with the topsoil/gravel small-area exemptions are 0.20 acre, 0.22 acre, and 0.62 acre for SAE-5, SAE-6, and SAE-7, respectively. All topsoil stockpiles are being protected from erosion by a combination of dikes, berms, and a vegetative cover.

At one time,sedimentation control for SAE-5, SAE-6, and SAE-7 was provided by the installation of straw-bale dikes around the perimeter of each disturbed area. These straw bales are no longer required but have become part of the natural vegetation through the years and will not be removed but rather will be allowed to decompose naturally. These straw bales will not be replaced nor will they be repaired.